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January 31, 2000

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Ex Parte Number Resource Optimization – CC Docket Nos. 99-200, 96-98

Dear Ms. Salas:

This letter shall serve as notification that on January 31, 2000, representatives of GTE met with members of the Federal Communications Commission's Common Carrier Bureau ("CCB") and Wireless Telecommunications Bureau ("WTB"). The purpose of the meeting was to discuss GTE's position regarding matters in the above-captioned proceeding. The attached material was used in our discussion.

Attendees from the CCB were Les Selzer, Cheryl Callahan, Diane Griffin-Harmon, Aaron Goldberger, Tejal Mehta, and Chuck Keller and from the WTB were John Spencer and Blaise Scinto. GTE representatives at the meeting were Norman Epstein, John Rollins, Charon Harris and the undersigned.

Pursuant to Section 1.1206 of the Commission's rules regarding ex parte communications, please include a copy of this notification in the public record of the above-captioned proceeding. Please call the undersigned should you have any questions.

Sincerely,

May Chan

cc: FCC attendees

Number Resource Optimization

January 31, 2000

FCC CC Docket No. 99-200, 96-98



GTE Supports National, Uniform 10 Digit Dialing

- The North American Numbering Plan (NANP) is a 10-Digit (10D) numbering plan
- FCC should establish a national, uniform mandatory 10D dialing plan for all calls (local & toll) and allow 1+10D dialing permissively
- States should be mandated to migrate to 10D dialing by a specific timeframe
- Maryland, for example, has successfully adopted 10D dialing with its relief implementation
- Uniform 10D dialing will ease the eventual expansion of the NANP
- Speed dialing is available to facilitate dialing
- Reduces customer confusion with consistent dialing plan nationwide

Numbering Plan Area (NPA) Relief

- Area code relief cannot be avoided, as it is a necessary consequence of using numbering resources
- GTE urges the FCC to promote overlay relief as the least intrusive relief methodology
 - overlays avoid costly number changes (i.e. splits require number changes, wireless handset reprogramming, etc.)
 - overlays can be implemented faster than area code splits
 - 10D dialing will ease transition to overlays
- NPA relief plans are necessary and must be implemented in a timely manner to avoid jeopardy
- Jeopardy should not be used as a standard practice to conserve numbers
- GTE does not support the SBC Transitional Non-LNP Overlay concept

Data Collection

- Reporting should be:
 - Standardized to make data comparable and to minimize costs
 - No lower than NXX-X level (1K) for wireline
 - At the NXX level (10K) for wireless
 - Electronic using a delimited data flatfile which could be loaded into Excel, Access, etc.
 - No more frequent than biannual
 - Divided into unambiguous categories:
 - Working (working in the Public Switched Telephone Network)
 - Reserved (Service order pending)
 - Aging (aggregate of residence, business, operator intercept, local recording)
 - Available (Basically, numbers not in above categories)
- GTE supports the sharing of aggregated data from the survey(s) with the states for the purposes of code relief activities obtained from the national survey

Hybrid Survey and Number Utilization Requests

- GTE urges the FCC to support the Hybrid survey alternative as it will help to minimize utilization requests burdening the industry
- Companies are being overwhelmed with utilization requests from multiple states, impacting numbering management responsibilities
- Guidance is required from the FCC to INC in developing the appropriate Hybrid survey methodology in a timely manner
- FCC should promptly adopt the NANC/INC recommended number definitions

Sequential Number Assignment

- NXX code holders should attempt to provide services in a manner which encourages efficient use of numbers
- Numbers should be assigned in a manner to preserve “poolable” 1000 blocks
- Assign numbers from thousand number blocks that are already in use and assign out of 0,1, 8, or 9 to business and residential whenever possible
- Carriers should be allotted an inventory for 9 months

GTE Supports National Pooling Guidelines and Standards

- Standard criteria should be adopted to identify NPAs that are good candidates for number pooling
 - The following criteria may be used to prioritize number pooling deployment with multiple NPAs (list is not necessarily in order of importance)
 - Projected exhaust date of NPA
 - Remaining assignable NXX codes within an NPA
 - Current rationing plan (lottery codes per month)
 - NPA relief plan (split/overlay)
 - Number of LNP-capable carriers
 - Number of non-mandated LNP carriers (I.e., paging & cellular)
 - Number of rate areas
 - Annualized code demand forecast
 - Total number of code holders

GTE Supports National Pooling Guidelines and Standards (cont.)

- New NPAs should be the initial targets for pooling, mature NPAs should be avoided
- Pooling should extend the life of an NPA a minimum of 2 years to be beneficial
- Pooling is not a substitute for area code relief
- Pooling should not be required for wireless carriers

Considerations for Initiating National Pooling

- LNP capability must be available
- NPAC/SMS 3.0 with EDR and INC Pooling Administrative guidelines should be used
- Testing and verification among carriers and different switching equipment must be completed
- Deployment should be phased-in over a 21 month period for all NPAs that are currently forecasted to exhaust in less than 2 years from the release of the FCC's pooling order
 - Allow 6 months to prepare for pooling and block identification
 - Thereafter, phase-in rate should be 10% the initial quarter and then the remaining divided evenly over the next 4 quarters
 - Use the NANPA-NPA relief schedule as the source for NPAs
- Each state should be restricted to no more than 3 NPAs per qtr.
- States conducting trials should be given time (i.e., 9 months) to migrate to the national pooling guidelines and standards

1K Pooling Implementation Issues

- Key components necessary for 1K number pooling for Service Providers (SPs) to share resources
 - INC Administrative Pooling Guidelines
 - Reliable Number Portability Administration Center/Service Management System (NPAC/SMS) procedures
 - Contract between the industry and selected pooling administrator
 - Coordinated National implementation plan
- FCC's interim authority requires NPA backup relief plans, but some States appear hesitant to order implementation dates since pooling is viewed as a panacea
- There is a need to coordinate trials among states
 - Multiple pooling trials, audits, and utilization study requirements are costly
 - Multiple trials are negatively impacting our preparation to implement national pooling

Benefits of 1.4 Pooling Trials are Questionable

- The use of NPAC/SMS release 1.4 has limitations
 - May cause some service providers to unnecessarily add STP/SCP/LSMS hardware capacity
 - Will adversely impact Local Number Portability (LNP) provisioning performance
 - NeuStar & LNPA Working Group have indicated that converting to the more efficient NPAC/SMS 3.0 with Efficient Data Representation (EDR) will be a major effort
- Database structure must be expanded to accommodate EDR
 - LNP systems will be down for many hours/days during conversion from NPAC release 1.4 to 3.0
 - Down time will impact porting transactions and block activations - This could be customer/provider service affecting
- Transition from release 1.4 to release 3.0 will not only add cost but complexity which increases the probability of customer affecting problems
- Systems cannot concurrently operate release 1.4 and 3.0 within the same NPAC region

Utilization Threshold vs. Months-to-Exhaust

- Months-to-exhaust is a more accurate parameter than utilization threshold
 - Fill rate requirement at the rate center level could have harmful effect of causing a provider to deny service out of some specific switches where the carrier has multiple switches per rate center
 - Currently it is not possible to share codes between switches (of the same carrier) within the same rate center
 - Wireless Prepaid service and other similar services will be negatively impacted because these type of services require unique block of codes to operate
- Months-to-exhaust is incorporated in INC guidelines and is used by the industry today
- GTE strongly recommends using months-to-exhaust

Cost Recovery

- Any recovery mechanisms adopted by the FCC must consider and build upon decisions made in the LNP proceedings
- Joint costs related to LNP and pooling, which were excluded from recovery in LNP should be recoverable in 1K Pooling
- A balanced cost recovery plan that distributes costs of number conservation measures across all users of telecommunications service would be the most equitable and competitively neutral
- Pooling recovery should be allowed statewide after implemented in the first NPA because all telecommunication users benefit from conservation of telephone numbers
- All incurred costs for number pooling should be classified as interstate to ensure consistent cost recovery methods and avoid complications which result from multi-state cost allocations

CONCLUSIONS

- Order should require migration to a national uniform 10-D dialing plan by a specific timeframe
- Promote overlay relief as the least intrusive relief methodology
- NPA relief plans are necessary and must be implemented in a timely manner to avoid jeopardy situations
- The Hybrid survey and National Pooling guidelines must be adopted and supported
- Data collection/reporting should be standardized nationwide
- Pooling should only be implemented where it significantly extends the life of the existing area code
- All TBP related costs should be allowed statewide after implemented in the first NPA as all telecommunication users benefit from conservation of telephone numbers